Applicants would like to thank the examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and favorable reconsideration of the subject application is requested in view of the comments and/or amendments made herein.

Claims 22-32 and 34-40 remain in this application. Claims 1-21 were previously canceled. Claim 33 has been withdrawn and canceled, and applicant retains the right to present those claims in a divisional application. New claims 41-42 are added without adding any new matter.

The Examiner has issued a restriction requirement in this case, which is rendered moot by the new claims. Effectively, applicant is effectively electing Group I, represented by claims 1-32 and 34-42, which share special technical feature(s). Furthermore, applicant provisionally elects Species A1, A2, although the restriction of species is traversed below, and should be withdrawn for the following reasons. Furthermore, a restriction of the new claims would not be proper for the reasons discussed below:

The Examiner issued the restriction arguing that the species were not related to a single inventive concept under PCT Rule 13.2, arguing that they lacked corresponding technical features. New claim 41 shares the technical features of original claim 22, and thus under PCT Rule 13.2, a restriction of the claims would not be proper. The current claims all relate to a single inventive concept under PCT Rule 13.2. As the Examiner well knows, it is not proper to restrict PCT based claims merely on the basis of method versus apparatus distinctions, and thus a restriction of these claims is not proper.

Furthermore, a restriction of species A1 & B1, and A2 & B2 as proposed by the Examiner, is not proper. Applicant notes that the Examiner is relying on the *dependent* claims to make the species restriction (e.g., claims 29 & 30, and 31 & 32, are dependent claims). It is not proper to make such a restriction under a PCT application unity of invention standard. PCT Rule 13.4, Dependent Claims, recites:

> Subject to Rule 13.1, it shall be permitted to include in the same
> international application a reasonable number of dependent claims,
> claiming specific forms of the invention claimed in an independent claim,
> even where the features of any dependent claim could be considered as
> constituting in themselves an invention.

These four claims are surely a reasonable number of claims, and thus clearly meet the requirements of the rule. Note that rule 13.1 is the unity of invention rule, which, as discussed above, is already satisfied for the independent claims. Accordingly, restricting the claims based on species found in dependent claims is clearly not proper by PCT Rule 13.4.

In addition, the Examiner's characterization of the species A1 and B1 claims is not proper. Species A1 (claim 29) refers to the feeding directions of the *second and further* cutting devices being parallel, but species B1 (claim 30) does not require that the feeding directions of the second and further cutting devices be perpendicular to each other. Species B1 concerns the feeding directions of the second and further cutting devices (which could be parallel according to claim 29) being perpendicular to the feeding direction of the *first* cutting device (the claim does not refer to the second or subsequent cutting devices). Hence, A1 and B1 do not exclude each other; in fact they can work together to form a preferred embodiment shown in the only drawing of the patent application. Thus, this species restriction is improper for this reason as well.

Accordingly, the restrictions of species is not proper under PCT Rule 13.1, and must be withdrawn.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. SCAN1-41253.

Respectfully submitted,

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